

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

IN RE:

*

ROBERT & KRISTEN BEGGS,

Debtor(s).

*

CASE NO. 06-20696-JDL
Chapter 13

*

OBJECTION TO CONFIRMATION OF PLAN

Comes now Emmett Dixon Bell III, by and through his counsel of records, Bettye S. Bedwell, and objects to confirmation of the debtors' proposed Chapter 13 Plan and in support thereof would show unto the Court as follows:

1. Movant and the debtor, Kristen Beggs, were previously married;
2. Movant filed for divorce against the debtor, Kristen Beggs, in Circuit Court of Shelby County, Tennessee under Cause No. CT-003177-03.
3. A Final Decree of Divorce was entered in the Circuit Court, Cause No. CT-003177-03 on June 25, 2003;
4. Movant and the debtor, Kristen Beggs, entered a Marital Dissolution Agreement in the aforementioned Circuit Court case which stated in part:

4. **NON-DISCHARGEABILITY.** With respect to each party's responsibility for payment of certain debts and liabilities, and their obligation to hold the other harmless for the payment thereof, the parties understand and agree that their obligation is a non-dischargeable debt under the Bankruptcy Code, this obligation being part of the final financial support settlement for both parties.

15. **PERSONALTY.** ...Wife shall have and keep her Honda vehicle, and she shall pay and be responsible for the notes owed thereon.

5. The debtors filed for relief under Chapter 13 of the Bankruptcy Code on February 1, 2006;
6. The debtors listed a deficiency balance owing to AMO Recoveries for the indebtedness owed on the debtor, Kristen Beggs', Honda vehicle for which Movant is jointly obligated to be treated as a general unsecured debt to be paid a rate determined by the Chapter 13 Trustee's Office.

WHEREFORE, MOVANT PRAYS that:

1. The confirmation of the debtors' Plan as proposed be denied;
2. The debtors' case be dismissed with prejudice;
3. The Movant be allowed such other, further and general relief to which he may be entitled.

Respectfully submitted,

/s/ Bettye S. Bedwell

Bettye S. Bedwell (015354)
200 Jefferson Ave., Suite 202
Memphis, TN 38103
PH: (901) 577-0009

CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of the foregoing were served on the following parties by placing a copy of same in the U. S. Mail, postage prepaid on the 28th day of March, 2006:

Debtors
Debtors' Attorney

/s/ Bettye S. Bedwell